UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

IN RE OPENAI, INC., COPYRIGHT INFRINGEMENT LITIGATION
 	
This document relates to:
 	
    Case No. 1:23-cv-08292
    Case No. 1:23-cv-10211
    Case No. 1:24-cv-00084
    Case No. 1:25-cv-03291
    Case No. 1:25-cv-03297
    Case No. 1:25-cv-03482
    Case No. 1:25-cv-03483
	Case No. 25-md-3143-SHS-OTW
	
	DECLARATION OF HENRY WALTER IN SUPPORT OF PLAINTIFFS' OPPOSITION TO MICROSOFT'S MOTION TO STRIKE

I, Henry Walter, hereby declare as follows:

1.   I am an attorney at Susman Godfrey LLP and counsel for the Class Plaintiffs in this action. I make these statements based on personal knowledge, and if called upon to testify as to the facts stated in this declaration, I would and could so testify.

2.   Attached hereto as Exhibit 1 is a true and correct copy of the transcript of the hearing held before The Honorable Robert M. Illman in *Tremblay v. OpenAI* on December 17, 2024.

3.   Attached hereto as Exhibit 2 is a true and correct copy of the transcript of the hearing held before the Judicial Panel on Multidistrict Litigation for MDL No. 3143 on March 27, 2025.

4.   Attached hereto as Exhibit 3 is a true and correct copy of the transcript of the hearing held before the Honorable Sidney H. Stein and the Honorable Ona T. Wang in *In re: OpenAI Inc. Copyright Infringement Litigation* on May 22, 2025.

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I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

Executed on this 14th day of August, 2025, in New York, NY.

/s/ *Henry Walter*
Henry Walter

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